Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms	)	CC Docket No. 98-171
	)	
Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990	)	CC Docket No. 90-571
	)	
Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size	)	CC Docket No. 92-237 NSD File No. L-00-72
	)	
Number Resource Optimization	)	CC Docket No. 99-200
	)	
Telephone Number Portability	)	CC Docket No. 95-116

REPLY COMMENTS OF
QWEST COMMUNICATIONS INTERNATIONAL INC.

Qwest Communications International Inc. ("Qwest") hereby submits its Reply Comments in response to the Federal Communications Commission's ("Commission" or "FCC") *Notice of Proposed Rulemaking*.[1]

[1] *In the Matter of Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone*

In its initial Comments, Qwest asserted that assessing universal service contributions on "net booked"[2] interstate end-user telecommunications revenues would best serve the various goals articulated in the *Notice*, including simplifying and streamlining the contribution process, ensuring equitable and nondiscriminatory recovery of carrier contributions, maintaining competitive neutrality, and minimizing reporting and other administrative requirements. As reflected in the record compiled in this proceeding, these goals are not necessarily consistent with each other. In other words, while a given proposal may further a particular goal, it also may undermine one or more other important objectives. For example, frequent and detailed reporting requirements may bolster the integrity of the contribution system, but such requirements also increase the administrative burden on carriers and the Universal Service Administrative Company ("USAC"). As a result, the Commission should seek ways of maintaining the integrity of the system while minimizing reporting and other administrative requirements.

Similarly, while use of projected or current revenues may reduce or eliminate the current lag in the contribution system, it would also increase the likelihood of "gaming," undermine the reliability of the data submitted to USAC, and increase administrative burdens. Consequently, the Commission should question whether the perceived "problem" cited for moving to projected or current revenues – that the current system advantages carriers with increasing market share – warrants a departure from the practice today of assessing on more reliable and verifiable historical revenue information, particularly given the FCC's recent reduction of the interval

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Number Portability, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116, *Notice of Proposed Rulemaking*, FCC 01-145, rel. May 8, 2001 ("*Notice*"). Comments were filed June 25, 2001.

[2] "Net booked" revenues refer to the revenue amount that a carrier enters into its accounting books, less any uncollectible revenues reflected in those books.

between accrual of revenues and assessment of contributions on those revenues.[3] Qwest submits that such a departure is not warranted.

Finally, while the assessment of per-line or per-account charges may address the problem of certain carriers levying excessive line-item charges on some or all of their end users, such proposals would also lack competitive neutrality, increase administrative burdens and complexity, and raise concerns about fund sufficiency.

Given these considerations, the Commission should reject proposals to base contributions on projected or current revenues or on a flat-fee basis, and adopt Qwest's proposal to assess contributions on net booked interstate end-user telecommunications revenues. The Commission should also seek to minimize exemptions for classes of carriers or classes of services. Finally, the Commission must not unreasonably restrict the ability of carriers to recover universal service charge assessments from their end-user customers.

I. THE COMMISSION SHOULD REJECT PROPOSALS TO ASSESS UNIVERSAL SERVICE CONTRIBUTIONS ON PROJECTED OR CURRENT REVENUES OR ON A FLAT-FEE BASIS

In the *Notice*, the Commission expressed concern about the extent to which certain carriers are assessing line item charges on some or all of their customers that significantly exceed the carriers' contribution factor established by the Commission.[4] The Commission sought comment on a number of different proposals to address this and other issues, including assessing on collected revenues, current or projected revenues, or on a flat-fee basis. As discussed in Qwest's initial Comments, moving to assessment on projected or current revenues or on a flat-

[3] *In the Matter of Federal-State Joint Board on Universal Service, Petition for Reconsideration filed by AT&T*, CC Docket No. 96-45, *Report and Order and Order on Reconsideration*, FCC 01-85 ¶ 2, rel. Mar. 14, 2001.

[4] *Notice* ¶ 5.

fee basis would not be consistent with the requirements of Section 254. This fact is confirmed by a review of the initial Comments.

Any perceived advantages of assessment on current or projected revenues are outweighed by the problems raised by such an approach. AT&T Corp. ("AT&T") and WorldCom, Inc. ("WorldCom") fail to substantiate that the current lag between accrual of and assessment on revenues confers a significant competitive advantage on any particular carrier or group of carriers. As pointed out by SBC Communications Inc. ("SBC"), the phenomenon of new entrants gaining market share from incumbents is not new and is not limited to long distance services.[5] Since the passage of the Telecommunications Act of 1996, incumbent local exchange carriers (or "LEC") have steadily lost local market share to competitors. Moreover, the proponents of assessing on current or projected revenues have failed to show that the higher than expected line item charges cited by the Commission are attributable to the "six-month lag," rather than uncollectible revenues or some other factor.

Qwest understands that the current assessment on gross billed revenues can create inequities for carriers with a large incidence of uncollectible revenues. Certain parts of Qwest's business, such as dial-around calling services, encounter much higher percentages of uncollectible revenues than services offered by Qwest's incumbent LEC business unit. While Qwest generally takes steps to minimize its uncollectible revenues, certain segments of the industry tend to face a higher incidence of nonpaying customers. In general, Qwest incurs a higher rate of uncollectible revenues as an out-of-region interexchange carrier ("IXC") than as a LEC. In short, Qwest acknowledges the unfairness of requiring carriers to make universal service contributions based on revenues that the carrier cannot collect despite its best efforts.

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[5] SBC Comments at 5 n.10.

Where Qwest parts from commenters such as AT&T and WorldCom, however, is with regard to the best solution for this problem. Qwest asserts that the remedies proposed by these parties – basing universal service assessments on projected or current revenues or on a flat-fee basis – would cause more problems than they would solve. With regard to use of projected or current revenues, USAC acknowledges that basing assessments on current revenues in particular could undermine the integrity of the data submitted, because USAC would lack the current carrier end-user revenue information on which carriers calculate their contributions.[6] According to USAC, this proposal would also increase administrative burdens on both contributors and the administrator.[7] In fact, AT&T's proposal would require monthly reporting of assessable revenues.[8] Furthermore, neither AT&T nor WorldCom have demonstrated that the burdensome reporting requirements in their proposals are even feasible for carriers or USAC. Similarly, basing contributions on projected revenues would result in a more complicated contribution mechanism. For example, in order to minimize the potential of large adjustments when projected revenues are trued up with actual revenues, the Commission would at a minimum have to establish disincentives for underreporting of revenues.[9]

Assessing contributions on a flat-fee basis is even more problematic. While proponents characterize such a change as a "simplification,"[10] it would be anything but. In fact, USAC describes the implementation of a flat-fee contribution mechanism as "very complex."[11] This view is confirmed by WorldCom's presentation of its flat-fee proposal, which would establish

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[6] USAC Comments at 10-12.

[7] *Id.* at 10.

[8] AT&T Comments at 10.

[9] USAC Comments at 12.

[10] AT&T Comments at 13.

contribution levels based either on connections, or, for services that are not offered on a per-line basis, on capacity.[12] WorldCom's proposal would establish set line item charges for residential, wireless, paging, and single-line business customers. Assessments for multi-line business customers would cover the remainder of the universal service demand and therefore presumably would fluctuate with varying demand. For facilities other than switched access, WorldCom proposes per-connection assessment based on the bandwidth capacity of the facilities. Thus, for example, facilities with capacity between 1.544 and 45 Mb/s would be assessed at five times the contribution rate for facilities with capacity of less than 1.544 Mb/s, and facilities with capacity of 45 Mb/s or greater would be assessed at 40 times that rate.[13] As the Commission has previously recognized, the adoption and administration of such "equivalency ratios" would be difficult, and could inadvertently favor certain services or providers over others if the ratios are improperly calculated or are inaccurate.[14] Thus, WorldCom's assertion that its proposal will not affect purchasing decisions is unfounded. The complexity of WorldCom's proposal is also reflected in the need for a 12-month transition period for carriers to develop new contribution and collection systems for assessment on a flat-fee basis.[15]

WorldCom's other arguments in favor of flat-fee assessments are also misplaced. For example, the fact that IXCs on average may make higher universal service contributions than LECs is not surprising and does not justify assessing contributions on a flat-fee basis in order to

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[11] USAC Comments at 16.

[12] WorldCom Comments at 22-23.

[13] *Id.* at 5.

[14] *In the Matter of Federal-State Joint Board on Universal Service, Report and Order,* 12 FCC Rcd. 8776, 9210 ¶ 852 (1997), *aff'd in part, rev'd in part, remanded in part sub nom. Texas Office of Pub. Util. Counsel v. FCC*, 183 F.3d 393 (5th Cir. 1999), *cert. denied,* 120 S.Ct. 2212 (2000).

[15] WorldCom Comments at 21.

recover more contributions from LECs.[16] The Court of Appeals for the Fifth Circuit has found that the statute does not allow the Commission to assess universal service contributions on intrastate revenues.[17] To the extent *local* exchange carriers tend to have less interstate traffic than IXCs, the Act mandates that they contribute proportionately less than IXCs.

The Commission should also summarily dismiss the proposal of the Ad Hoc Telecommunications Users Committee ("Ad Hoc")[18] to collect universal service contributions exclusively from LECs and commercial mobile radio service ("CMRS") providers on a flat-fee basis for every line connected to a LEC switch or via a CMRS provider handset.[19] Under this proposal, IXCs would no longer contribute to the universal service fund at all. This proposal starkly ignores the statutory requirement that all providers of interstate telecommunications services contribute to the fund.[20] Moreover, Ad Hoc's suggestion that such a methodology would be "equitable" because carriers can recover their contributions from their end users overlooks the administrative cost of contributing to the fund, as well as the possibility that certain services that use a LEC switch may compete with services that do not use such a switch. In the past, the Commission has specifically avoided methodologies that would favor particular types of carriers or services. Ad Hoc's proposal would contravene both policies, as well as the unambiguous language of the Act.

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[16] *Id.* at 18.

[17] *Texas Office of Pub. Util. Counsel v. FCC*, 183 F.3d at 447-48.

[18] Interestingly, Ad Hoc's comments do not identify the committees.

[19] Ad Hoc Comments at 27.

[20] 47 U.S.C. § 254(d) ("*Every* telecommunications carrier that provides interstate telecommunications services *shall contribute*, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service." (emphasis supplied)).

As the preceding discussion illustrates, the proposals to assess on projected or current revenues or on a flat-fee basis are rife with problems. These proposals also are unnecessary. Qwest's proposal to assess on net booked revenues will achieve the Commission's primary objectives of simplifying the contribution methodology and narrowing the gap between the contribution factor established by the Commission and line item charges on end-user bills. This proposal also offers the advantage of a more reliable and verifiable contribution base.[21]

II. THE COMMISSION SHOULD MINIMIZE EXEMPTIONS FROM THE CONTRIBUTION MECHANISM

In its initial Comments, Qwest asserted that the Commission should seek to minimize exemptions for classes of carriers or classes of services. Such exemptions increase the burden on contributing carriers and their end users and may result in a competitive advantage to competing carriers that are not required to contribute. For example, the Commission should eliminate any exemption for cable services that compete with telecommunications services provided by other providers. In particular, there is no reason to exempt revenues for cable modem services, which compete directly with digital subscriber line ("DSL") services.[22]

As discussed in Qwest's initial Comments, the Commission should also eliminate or reduce the *de minimis* exemption. While a number of commenters oppose any change in the current *de minimis* exemption, none except USAC provided any data or additional information justifying the current $10,000 exemption. Furthermore, USAC's estimate of the additional expense it would incur in collecting from carriers that are currently classified as *de minimis* is much less than the amount it is likely to collect from such carriers. Thus, elimination or

[21] Qwest Comments at 4-5. As discussed in its initial Comments, Qwest agrees in principle with assessment on collected revenues but believes that net booked revenues offer a more reliable and verifiable data set. *Id.*

reduction of this exemption would result in a net gain in the size of the contribution base and should be implemented.

III. THE COMMISSION MUST NOT UNREASONABLY RESTRICT THE ABILITY OF CARRIERS TO RECOVER UNIVERSAL SERVICE CONTRIBUTIONS FROM THEIR END-USER CUSTOMERS

In its initial Comments, Qwest expressed conditional support for the Commission's proposal regarding consistency between the contribution factor established by the Commission and line item charges to end-user customers that are intended to recover a carrier's contribution.[23] In particular, assuming the revenue base for assessment closely tracks the revenue base from which carriers recover contributions and a carrier chooses to recover its contributions through line item charges on end-users' bills, those charges should closely correspond to the prescribed percentage, plus a reasonable cost for expenses.[24] This proposal would simplify line item charges, while keeping consumers informed.

Contrary to the spirit of this proposal, certain commenters argue that the Commission should prohibit carriers from assessing line item charges.[25] These comments should be dismissed out of hand. Placement of a line item charge on an end-user bill for the recovery of universal service contributions serves to inform consumers of the true rates of the telecommunications services they are purchasing, as well as the amount they are paying for universal service. Furthermore, to the extent a carrier is required to contribute for universal service, it should have

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[22] *See also AT&T v. City of Portland*, 216 F.3d 871 (9th Cir. 2000) (concluding that cable modem services for Internet transmission are telecommunications services).

[23] Qwest Comments at 11-13.

[24] To the extent the Commission allows flexibility in the recovery of such charges, however, such flexibility should be provided to all carriers on an equal basis.

[25] National Association of State Utility Consumer Advocates Comments at 8; West Virginia Consumer Advocate Comments at 4-5.

the right to inform its customers of the portion of their total charges that are going toward recovery of that contribution.

IV. CONCLUSION

For the reasons discussed above and in Qwest's initial Comments, the Commission should adopt the positions advocated by Qwest. In particular, the Commission should decline to assess contributions on projected or current revenues or on a flat-fee basis and minimize all exemptions from contribution, and not unreasonably restrict the ability of carriers to recover universal service contributions from their end-user customers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be 1) filed with the FCC via its Electronic Comment Filing System, 2) hand served on Ms. Sheryl Todd, 3) served, via email, on the entity marked with an asterik (*), 4) served, via First Class United States mail, postage prepaid, on all other parties listed on the attached service list.

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